

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BRUCE HARRIS and ROY MCCULLUM,)
Individually and on Behalf of All Others)
Similarly Situated)
Plaintiffs,) CIVIL ACTION FILE
v.) NO. 1:22-cv-2530-TWT
GEORGIA-PACIFIC WOOD PRODUCTS)
LLC, and GEORGIA-PACIFIC CONSUMER OPERATIONS LLC)
Defendants.)

**MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR
SETTLEMENT APPROVAL**

Plaintiffs Bruce Harris and Roy McCullum (“Plaintiffs”) and Defendants Georgia-Pacific Wood Products LLC, and Georgia-Pacific Consumer Operations LLC, by and through their undersigned counsel, submit the following Motion for Extension of Time to File Motion for Settlement Approval:

1. On September 29, 2023, the Parties filed a Joint Notice of Settlement and Motion for Time to Move for Settlement Approval wherein the Parties stated they had reached a settlement in principle and anticipated filing a Motion for Settlement Approval within 60 days. *See* ECF 57. On October 2, 2023, the Court

granted the Parties motion, making the Motion for Settlement Approval due on December 1, 2023. *See* ECF No. 58.

2. The Parties have exchanged drafts of the settlement agreements and Plaintiffs' counsel is diligently preparing the Motion for Settlement Approval. The Parties, however, require additional time to finalize Motion for Settlement Approval and the settlement agreement in order to edit the documents to the satisfaction of all parties and to obtain all of the required signatures.

3. Accordingly, the Parties request that the Court allow them an additional fourteen (14) to edit and fully execute their agreement and file a Motion for Settlement Approval.

4. This extension is sought in good faith for the purpose of efficiently resolving the case, and not for delay.

WHEREFORE, premises considered, the Parties pray that this Court extend the deadline for the Parties to file their Motion for Settlement Approval for fourteen (14) days, to December 15, 2023.

Respectfully submitted this 30th day of November, 2023.

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CERTIFICATE OF SERVICE

I, Josh Sanford, hereby certify that on the date imprinted by the CM/ECF system, a true and correct copy of the foregoing document was electronically filed via the CM/ECF system, which will provide notice to the following attorneys of record:

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